

Fact Sheet



For Final Minor Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to this Minor Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on September 16, 2011.

Permit Number: **R30-06900071-2011 (MM01)**

Application Received: **September 29, 2014**

Plant Identification Number: **03-54-069-00071**

Permittee: **American Disposal Services of West Virginia, Inc. d.b.a Short Creek Landfill**

Mailing Address: **258 North Fork, Short Creek, WV 26003**

Permit Action Number: *MM01 Revised: June 16, 2015*

Physical Location:	Short Creek, Ohio County, West Virginia
UTM Coordinates:	530.57 km Easting • 4444.10 km Northing • Zone 17
Directions:	From the city of Wheeling, take Route 2 North, turn right onto Girty Point Road and follow road to landfill.

Facility Description

The Short Creek Landfill (SCL) (NAICS 562212, SIC 4953) is a non-hazardous municipal solid waste (MSW) landfill that began operation in approximately 1986. The site consists of 280 acres of permitted area, including 115 acres of permitted disposal area. Of the 115 acres, 34 acres make up the closed landfill and 81 acres make up the active landfill. Currently 22 acres of the 81 acres of active area have been developed. Short Creek has a portable rock crushing and sizing plant.

This minor modification incorporates the requirements from Permit R13-2822A, which authorizes the installation of replacement Rock Crushing equipment.

Emissions Summary

The proposed modification will result in the following changes in potential emissions:

	Max Hourly Emission (pph)	Max Annual Emissions (TPY)	Change in Annual Emissions (TPY)
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Pollutant			
CO	0.73	3.18	-1.02
NO _x	3.37	14.75	6.15
PM ₁₀	3.81	16.71	0.71
Total PM	8.56	37.48	0.71
SO ₂	0.22	0.97	-3.45
VOC	0.27	1.20	0.98

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit over 100 tons per year of carbon monoxide. Due to this facility's potential to emit over 100 tons per year of a criteria pollutant, Short Creek Landfill is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

The modification to this facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR7	To prevent and control PM from Manufacturing Processes
	45CSR13	Construction Permits
	45CSR16	New Stationary Sources Standards of Performance
	45CSR30	Operating permit requirement
	40 CFR 60 Subpart IIII	Standards of Performance for Internal Combustion Engines
	40 CFR 60 Subpart ZZZZ	NESHAPs for Reciprocating Internal Combustion Engines

State Only: None.

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-2822A	January 6, 2015	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table," which may be downloaded from DAQ's website.

Determinations and Justifications

The following changes were made to the Title V permit:

- The Equipment Table and Active Permits Table were updated.
- Conditions 3.1.9. and 3.5.10. were deleted because 45CSR42 was repealed.
- Condition 3.7.2. was updated to include 40 CFR 60 Subpart OOO as a non-applicable requirement (see Non-Applicability Determinations below).
- Condition 6.1.1. was updated to correspond with the new requirements from Sections 4.1.1. and 4.1.2. of R13-2822A.
- Condition 6.1.2. was changed by deleting the first sentence and paragraphs a. and c. since they were no longer in R13-2882A. The paragraphs were renumbered and the R13-2882A citations were updated.
- Condition 6.1.4. was updated. R13-2882A listed more applicable 45CSR7 requirements and these were added to the Title V permit. R13-2882A citations were updated.
- Conditions 6.1.5., 6.1.6., and 6.1.7. were added to incorporate new requirements from R13-2882A.
- Condition 6.2.2. was updated to correspond with the changed requirements from R13-2822A.
- Condition 6.4.3. was added to incorporate a new requirement from R13-2822A.
- Condition 6.5.1. was deleted because it was no longer a requirement in R13-2822A.
- 40 CFR 60 Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines. The facility is subject to this subpart because the engine was manufactured after April 1, 2006 (40 CFR § 60.4200(a)(2)(i)). The engine emissions for Emission Point DG-E are EPA Tier III Certified, Certificate Number: CPX-NRCI-10-22.
- 40 CFR 63 Subpart ZZZZ – National Emission Standards for HAPs for Stationary Reciprocating Internal Combustion Engines. The facility is subject to this subpart because the engine is considered a new source of HAPs since it will be constructed on or after June 12, 2006 (40 CFR § 63.6590(a)(2)(iii)). The only requirements that apply are those required under 40 CFR 60 Subpart IIII (40 CFR § 63.6590(c)(1)).

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

40 CFR 60 Subpart OOO – Standards of Performance for Nonmetallic Mineral Processing Plants. The proposed rock crushing and sizing plant processes a maximum of 125 tons of rock per hour. In accordance with 40 CFR § 60.670(c)(2), plants with capacities of 136 megagrams per hour (150 tons per hour) or less are exempt from this NSPS.

Request for Variances or Alternatives

None.

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: N/A
Ending Date: N/A

Point of Contact

All written comments should be addressed to the following individual and office:

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Division of Air Quality
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Charleston, WV 25304
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Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Response to Comments (Statement of Basis)

Not applicable.